

U.S. COURTS  
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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF IDAHO**

IN THE MATTER OF )

**STAGGS DEVELOPMENT LLC** )  
**aka: Rounds Service** )

CASE NO. 01-42353-7

**TRUSTEE'S APPLICATION FOR  
LEAVE TO RETAIN ATTORNEYS**

DEBTOR(S)

COMES NOW L.D. Fitzgerald, Trustee herein, and hereby applies and respectfully represents to the Court as Follows:

**I.**

That applicant is the duly appointed, qualified and acting Trustee in Bankruptcy in the above Chapter 7 proceeding.

**II.**

That Applicant has found it necessary to retain and employ an attorney in the performance of the duties as Trustee for the reason that Applicant is not an attorney, and it will be necessary to have an attorney advise Applicant on general legal questions which may arise in the administration of the estate of the above named Debtor(s), and further to take any required action in connection with the collection and liquidation of estate assets, settlement of disputed claims, and settling of the estate.

**III.**

That Applicant desires to retain the services of Craig W. Simpson, Simpson & Gauchay, P.O. Box 50484, Idaho Falls, Idaho 83405-0484, to represent him to **collect account receivables, avoid preferences, recover assets**, and such matters of like nature which may arise in the course of these proceedings requiring competent legal services and advice. Said attorneys possess substantial familiarity with local Court procedures and significant experience in bankruptcy law and related matters. Applicants proposed hourly rate is \$125.00 for attorneys and \$35.00 per hour for paralegal. This rate, however, is subject to being increased or decreased from time to time as a result of changed economic conditions and/or modifications in applicants billing rates and procedures applicable to all applicants clients, as well as unique circumstances to this particular case. Fees and expenses to be subject to Court approval.

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**IV.**

Applicant is aware and Craig W. Simpson, Simpson & Gauchay, have disclosed to Applicant that said attorney has represented and are currently representing creditors in other bankruptcy cases, but upon the best information, knowledge and belief of said Applicant, Simpson, Simpson & Gauchay.

Craig W. Simpson, Simpson & Gauchay, does not hold or represent an interest adverse to the bankruptcy estate in the above named case.

**V.**

Applicant represents that retention of said attorney is in the best interest of the bankruptcy estate and may result in substantial dividends for the benefit of the estate.

WHEREFORE, Applicant prays for leave to retain and employ Craig W. Simpson, Simpson & Gauchay, as attorney for Trustee in the general administration of Applicant's duties as Trustee and for all other appropriate relief.

DATED this 17 day of January, 2001.

L.D. FITZGERALD, TRUSTEE  
Bankruptcy Trustee

By: \_\_\_\_\_

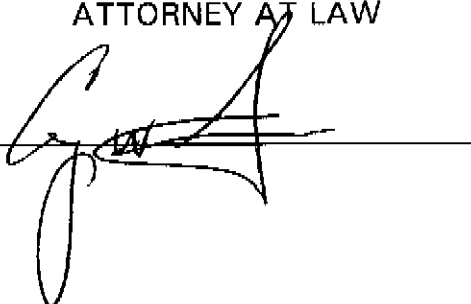
  
L.D. Fitzgerald, Trustee

**CERTIFICATE OF PROSPECTIVE ATTORNEYS**

Craig W. Simpson, Simpson & Gauchay, hereby certifies that he has read the Trustee's Application for Leave to Retain Attorney and, upon the undersigned's best information, knowledge and belief, certifies that Craig W. Simpson, Simpson & Gauchay does not hold or represent an interest adverse to the above named bankruptcy estate and does not have existing connections with the Debtor(s), the creditors, or any other party in interest, or their attorneys and/or accountants except as indicated below:

**CRAIG W. SIMPSON,  
SIMPSON & GAUCHAY  
ATTORNEY AT LAW**

By: \_\_\_\_\_



RE: STAGGS DEVELOPMENT LLC

NO: 01-42353-7

**APPLICATION TO HIRE ATTORNEY  
CERTIFICATE OF MAILING**

The below signed hereby certifies that a copy of the foregoing instrument was mailed to the U.S. Trustee, P.O. Box 110, Boise ID 83701 by placing the same in the U.S. Post Office, postage prepaid, on the 18 day of January, 2001.

by:   
Cheri Cuoio

ASSISTANT U.S. TRUSTEE  
P.O. BOX 110  
BOISE, ID 83701-0110

STAGGS DEVELOPMENT LLC  
252 N. 3800 E.  
RIGBY, ID 83442

L.D. FITZGERALD, TRUSTEE  
P.O. BOX 6199  
POCATELLO, ID 83205-6199

STEPHEN A. MEIKLE  
ATTORNEY AT LAW  
P.O. BOX 51137  
IDAHO FALLS, ID 83205

CRAIG W. SIMPSON  
ATTORNEY FOR TRUSTEE  
PO BOX 50484  
IDAHO FALLS ID 83405-0484